

## **AMENDMENTS TO THE SPECIFICATION**

Please replace paragraph [0027] with the following context:

5    “[0027] It is appreciated to refer to Figs. 4-6 to realize the NVM cell structure. Fig. 4  
is a cross-sectional diagram of the NVM cell shown in Fig. 3 along a line  
A-A’, Fig. 5 is a cross-sectional diagram of the NVM cell shown in Fig. 3  
along a line B-B’, and Fig. 6 is a cross-sectional diagram of the NVM cell  
shown in Fig. 3 along a line C-C’. As shown in Fig. 4, the portion of the  
10    NVM cell in the first region I includes a P-well 60 positioned in the  
substrate 50, an isolation structure 62 positioned on the P-well 60, and a  
stacked structure, which is composed of the control gate 52, an insulating  
layer 64, and the floating gate 54, positioned atop the isolation structure 62.  
In a better embodiment of the present invention, the substrate 50 is a P-type  
15    silicon substrate, the insulating layer 64 is an ONO (oxide/nitride/oxide)  
composite layer, the floating gate [[52]] 54 and the control gate [[54]] 52 are  
formed of doped polysilicon or other conductive materials, and the isolation  
structure 62 is either a field oxide layer or a shallow trench isolation  
structure. Alternatively, the substrate 50, the P-well 60 and the N-type  
20    doping region 58 can be formed into different conductive types, depending  
on the circuit design to the NVM cell. Optionally, a deep N-well is formed  
to provide a guard ring surrounding the NVM cell. In addition, the  
insulating layer 64 can be formed of any materials endurable to high-voltage  
operations.”

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